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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ERICA BLUTH, an individual, and
LAVORIA WILSON, an individual,

Plaintiff,

v.

TYLER BAEHR, an individual, and THE
CITY OF RENO, a political subdivision of
the State of Nevada.,

Defendants.

Case No.: 3:25-cv-00129-ART-CSD

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR JOINT
CASE MANAGEMENT REPORT
AND RESCHEDULE CASE
MANAGEMENT CONFERENCE**

Pursuant to the Court's Order Setting Case Management Conference issued on March 31, 2025 (ECF No. 9), Plaintiffs Erica Bluth and Lavoria Wilson, by and through their counsel, and Defendant City of Reno, by and through its counsel, hereby stipulate and respectfully request that the Court: (1) extend the deadline to file the Joint Case

1 Management Report, currently set for April 28, 2025, by thirty (30) days to May 28,
2 2025; and (2) reschedule the case management conference, currently set for May 1,
3 2025, to a date on or after June 2, 2025, at the Court's convenience.

4 This request is made due to Defendant Tyler Michael Baehr's failure to appear
5 and his request for an extension to respond to the Complaint to retain counsel.

6 On March 5, 2025, Plaintiffs filed their Complaint (ECF No. 1) against Defendants
7 Baehr and the City of Reno, alleging violations of constitutional and state law rights
8 arising from traffic stops in 2023 and 2024. The City of Reno filed its Answer on March
9 28, 2025 (ECF No. 6).

10 On or about April 14, 2025, during the Rule 26(f) conference, counsel for
11 Plaintiffs and the City of Reno discussed Baehr's lack of response. Baehr, through his
12 criminal defense counsel, has requested an extension of time to respond to the
13 Complaint, indicating he is seeking to retain counsel to represent him in this matter.
14 This request was communicated to Plaintiffs' counsel.

15 The Court's Order (ECF No. 9) requires the parties to file a Joint Case
16 Management Report by April 28, 2025, and attend a mandatory case management
17 conference on May 1, 2025.

18 Baehr's failure to appear and lack of counsel have hindered the parties' ability to
19 fully comply with the Court's order, as a comprehensive Joint Case Management
20 Report requires input from all parties, including Baehr, to address settlement,
21 discovery, and other required topics.

22 Plaintiffs and the City of Reno have met and conferred on April 14, 2025, and
23 agree that a 30-day extension of the Joint Case Management Report deadline and
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1 rescheduling of the case management conference are necessary to allow Baehr time to
2 retain counsel and participate, thereby ensuring a complete and meaningful report and
3 conference.

4 NOW, THEREFORE, the undersigned parties stipulate and request that the
5 deadline to file the Joint Case Management Report, currently set for April 28, 2025, be
6 extended by thirty (30) days to May 28, 2025, and the case management conference,
7 currently scheduled for May 1, 2025, at 9:00 a.m., be rescheduled to a time convenient
8 to the Court.
9

10 Dated: Apr 25, 2025

11 By: /s/ Luke Busby
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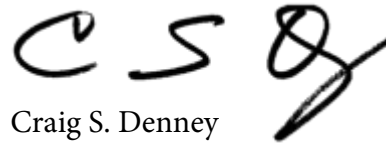
22 BY: /s/ Peter Keegan
23 Peter Keegan, Esq.
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ORDER

The deadline for the parties to file the Joint Case Management Report is extended to Friday, May 23, 2025.

The case management conference is rescheduled to Wednesday, May 28, 2025, at 9:00 a.m.

IT IS SO ORDERED:

A handwritten signature in black ink, appearing to read 'CS Denney', with a stylized flourish at the end.

Craig S. Denney

UNITED STATES MAGISTRATE JUDGE

DATED: April 28, 2025